REMARKS/ARGUMENTS

Status of Claims

Claims 1-18 stand rejected.

Claims 1-18 have been canceled.

Claims 19-38 are new

Thus, claims 19-38 are pending in this patent application.

The Applicants hereby request further examination and reconsideration of the presently claimed application.

Claim Rejections – 35 U.S.C. § 103

Claims 1-3, 6-8, 10, 12, 13, 16, and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent 6,836,657 (*Ji*) in view of U.S. Patent Application Publication 2003/0204711 (*Guess*) and U.S. Patent Application Publication 2002/0104080 (*Woodard*). Claims 4, 9, and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Ji* in view of *Guess, Woodard*, and U.S. Patent Application Publication 2003/0041133 (*Hiroshige*). Claims 5, 11, 15, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Ji* in view of *Guess, Woodard*, and U.S. Patent Application Publication 2002/0023258 (*Elwahab*). Claims 1-18 have been canceled, thus the 35 U.S.C. § 103(a) rejections should be withdrawn.

New Claims

New claims 19-38 recite novel and non-obvious aspects of the invention. Support for new claims 19-38 is found in the specification, thus no new matter is contained in these claims. Claims 20-34 depend from independent claim 19, and claims 36-38 depend from independent claim 35, thus claims 19-38 stand or fall on the application of the cited prior art to independent claims 19 and 35. The United States Supreme Court in *Graham v. John Deere Co. of Kansas City*

noted that an obviousness determination begins with a finding that **"the prior art as a whole in one form or another contains all"** **of the elements of the claimed invention**. *See Graham v. John Deere Co. of Kansas City*, 383 U.S. 1, 22 (U.S. 1966). The Applicants assert that claims 19-38 are allowable because the cited prior art fails to disclose at least one limitation set forth in independent claims 19 and 35.

The combination of *Ji, Guess, Woodard* fails to render obvious claims 19-38 because the combination of *Ji, Guess*, and *Woodard* does not disclose: (1) backing up configuration data of the Integrated Access Device (IAD) to a server according to a Simple Network Management Protocol (SNMP) backup configuration data command received from an IAD management system (IADMS); (2) downloading the updated files according to an SNMP update command received from the IADMS; and (3) recovering the configuration data backed up in the server according to an SNMP recovery configuration data command received from the IADMS. Claims 19 and 35 read:

19. A method for updating an Integrated Access Device (IAD) in a communication system using updated files stored in a server, the method comprising:

configuring a server information through an IAD Management System (IADMS), wherein the server information corresponds to the server;

receiving, by the IAD, a Simple Network Management Protocol (SNMP) backup configuration data command from the IADMS;

backing up configuration data of the IAD to the server according to the SNMP backup configuration data command;

receiving, by the IAD, an SNMP update command from the IADMS, wherein the SNMP update command comprises a server address information and an updated files name information, and wherein the server address information corresponds to the server's address; and

downloading, by the IAD, the updated files from the server according to the SNMP update command, wherein the server address information allows the IAD to locate the server, and wherein the updated files name information allows the IAD to identify the updated files in the server;

loading the updated files to the IAD;

receiving, by the IAD, an SNMP recovery configuration data command from the IADMS, wherein the SNMP recovery configuration data command comprises the server address information and a configuration data files name information; and

recovering, by the IAD, the configuration data backed up to the server according to the SNMP recovery configuration data command.

35. An Integrated Access Device (IAD), comprising:

an interface unit configured to establish a communication connection with a sever that stores updated files for updating the IAD; and

an update control unit configured to:

configure a server information through an IAD Management System (IADMS);

receive a Simple Network Management Protocol (SNMP) backup configuration data command from the IADMS;

transmit configuration data of the IAD to the server according to the SNMP backup configuration data command, wherein the configuration data is backed up to the server;

receive an SNMP update command from the IADMS, wherein the SNMP update command comprises a server address information and an updated files name information, and wherein the server address information corresponds to the server's address;

download the updated files from the server according to the SNMP update command, wherein the server address information allows the update control unit to locate the server, and wherein the updated files name information allows the update control unit to identify the updated files in the server;

load the updated files to the IAD;

receive an SNMP recovery configuration data command from the IADMS, wherein the SNMP recovery configuration data command comprises the server address information and a configuration data files name information; and

recover the configuration data backed up to the server to the IAD according to the SNMP recovery configuration data command.

(Emphasis added). First, claims 19 and 35 require backing up configuration data of the IAD to a server according to an SNMP backup configuration data command **received from an IADMS.** In contrast, *Woodard's* **user** (rather than the IADMS) specifies the configuration data that is backed up to the servers:

500

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┌─────────────────────────────────────┐
│      START OF UPLOAD PROCESS         │
└─────────────────────────────────────┘
                  │
                  ▼
┌─────────────────────────────────────┐
│ ESTABLISH A COMMUNICATION LINK BETWEEN│
│ FIRST COMPUTER-BASED DEVICE AND AN   │
│        APPLICATION SERVER            │
│                502                   │
└─────────────────────────────────────┘
                  │
                  ▼
┌─────────────────────────────────────┐
│          DOWNLOAD SEIM               │
│                504                   │
└─────────────────────────────────────┘
                  │
                  ▼
┌─────────────────────────────────────┐
│     DETECT SYSTEM/DATA FORMAT        │
│          COMPATIBILITY               │
│                506                   │
└─────────────────────────────────────┘
                  │
                  ▼
┌─────────────────────────────────────┐
│   USER SELECTS INFORMATION TO BE     │
│            UPLOADED                   │
│                508                   │
└─────────────────────────────────────┘
                  │
                  ▼
┌─────────────────────────────────────┐
│ UPLOAD XML DIRECTIVE FILE TO BDS     │
│            SERVER                     │
│                510                   │
└─────────────────────────────────────┘
                  │
                  ▼
┌─────────────────────────────────────┐
│       END OF UPLOAD PROCESS          │
└─────────────────────────────────────┘
```
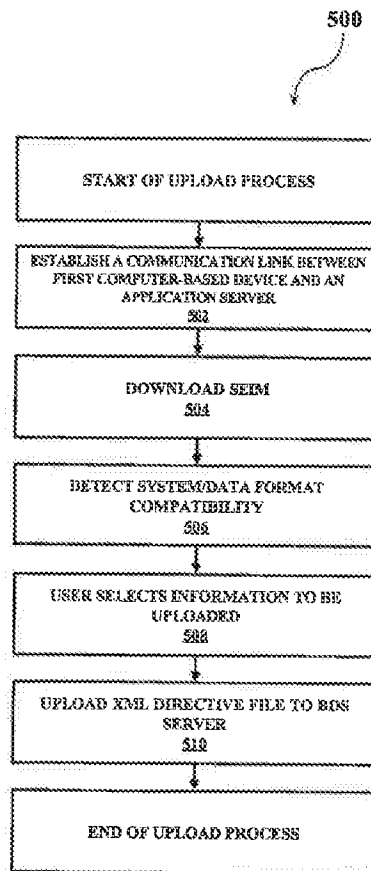
Figure 5

FIG. 5 illustrates the flowchart of the method 500 associated with a profile upload scenario. First, a communication link is established 502 between the first computer-based device 402 and the Application Server 108. Next, if all the necessary components are found on first computer-based device 402, a SEIM is downloaded 504 onto the first computer-based device 402. Next, the system detects the system and data compatibility format 506, so it knows what scripts to use. **The user then selects information (comprising any of the following: application settings, files, and other data) 508 to be uploaded onto a server.** Last, the SEIM then uploads an XML directive file 510 with the selected information onto the binary data server.

Woodard, FIG. 5 and ¶ 49 (emphasis added). As shown above, *Woodard* uploads configuration data (i.e., information) that is selected by the user, rather than configuration data that is specified by the IADMS. Neither *Ji* nor *Guess* makes up for the deficiencies of *Woodard* because (as admitted by the Examiner) neither *Ji* nor *Guess* discloses backing up configuration data. *See* Office Action April 28, 2011 (*Final Office Action*), p. 4. Thus, the combination of *Ji*, *Guess*, and

Woodard fails to disclose backing up configuration data of the IAD to the server according to an SNMP backup configuration data command received from the IADMS.

Second, claims 19 and 35 require downloading the updated files according to <u>an SNMP update command received from the IADMS</u>. As discussed above, *Woodard's* configuration data is <u>selected by the user</u>, not by an IADMS. Accordingly, *Woodard* downloads updated files according to a command from the user, not according to an SNMP update command received from the IADMS. Neither *Ji* nor *Guess* makes up for the deficiencies of *Woodard* because neither *Ji* nor *Guess* discloses an SNMP update command (much less an SNMP update command sent from an IADMS). Thus, the combination of *Ji*, *Guess*, and *Woodard* fails to disclose downloading the updated files according to an SNMP update command received from the IADMS.

Third, claims 19 and 35 require recovering the configuration data backed up in the server according to <u>an SNMP recovery configuration data command received from the IADMS</u>. As discussed above, *Woodard's* configuration data is <u>selected by the user</u>, not by an IADMS. Accordingly, *Woodard* recovers configuration data according to a command from the user, not according to an SNMP recovery configuration data command received from an IADMS. *Ji* and *Guess* fail to make up for the deficiencies of *Woodard* because neither *Ji* nor *Guess* discloses an SNMP recovery configuration data command received from an IADMS. Thus, the combination of *Ji*, *Guess*, and *Woodard* fails to disclose recovering the configuration data backed up in the server according to an SNMP recovery configuration data command received from the IADMS.

Neither *Hiroshige* nor *Elwahab* remedy the shortcomings of *Ji*, *Guess*, and *Woodard*. As such, the cited prior art fails to disclose at least one limitation set forth in claims 19 and 35, and consequently claims 19-38 are allowable.
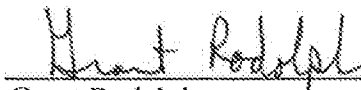
CONCLUSION

Consideration of the foregoing amendments and remarks, reconsideration of the application, and withdrawal of the rejections and objections is respectfully requested by the Applicants. No new matter is introduced by way of the amendment. It is believed that each ground of rejection raised in the Final Office Action dated April 28, 2011 has been fully addressed. If any fee is due as a result of the filing of this paper, please appropriately charge such fee to Deposit Account Number 50-1515 of Conley Rose, P.C., Texas. If a petition for extension of time is necessary in order for this paper to be deemed timely filed, please consider this a petition therefore.

If a telephone conference would facilitate the resolution of any issue or expedite the prosecution of the application, the Examiner is invited to telephone the undersigned at the telephone number given below.

Respectfully submitted,
CONLEY ROSE, P.C.

Date: 8/11/11

Grant Rodolph
Reg. No. 50,487

5601 Granite Parkway, Suite 750   ATTORNEY FOR APPLICANTS
Plano, TX 75024
(972) 731-2288
(972) 731-2289 (Facsimile)